

**IN THE UNITED STATES DISTRICT COURT FOR  
WESTERN DISTRICT OF PENNSYLVANIA**

ABBY B. CONLEY,

CIVIL DIVISION

Plaintiff,

No.: 05-CV-76 E

-vs-

Judge Sean J. McLaughlin

COUNTY OF ERIE, ERIE COUNTY OFFICE  
OF CHILDREN AND YOUTH a/k/a ERIE  
COUNTY CHILD WELFARE SERVICE,  
RICHARD SCHENKER, individually and in  
his capacity as County Executive of Erie  
County, Pennsylvania, PETER CALLAN,  
individually and in his capacity as Erie County  
Director of Personnel, DEBRA LIEBEL,  
individually and in her capacity as Executive  
Director, Erie County Office of Children and  
Youth a/k/a Erie County Child Welfare  
Service, and JOHN A. ONORATO,  
ESQUIRE, individually and in his capacity as  
Erie County Solicitor,

Defendants.

**DEFENDANTS', COUNTY OF ERIE, EIRE COUNTY OFFICE OF CHILDREN AND  
YOUTH a/k/a EIRE COUNTY CHILD WELFARE SERVICE, RICHARD SCHENKER,  
PETER CALLAN, DEBRA LIEBEL,  
OPPOSITION TO PLAINTIFF'S AMENDED MOTION TO EXTEND DISCOVERY**

AND NOW, comes the Defendants, COUNTY OF ERIE, EIRE COUNTY  
OFFICE OF CHILDREN AND YOUTH a/k/a EIRE COUNTY CHILD WELFARE SERVICE,  
RICHARD SCHENKER, PETER CALLAN, DEBRA LIEBEL by and through their counsel  
Edmond R. Joyal, Jr., Esquire and the Law Office of Joseph S. Weimer and hereby files this  
Opposition to Plaintiff's Amended Motion to Extend Discovery as follows:

1. These Defendants hereby incorporate by reference their Opposition to the previously filed Motion to Extend Discovery.

LAW OFFICE OF JOSEPH S. WEIMER

*s/Edmond R. Joyal, Jr.*  
Edmond R. Joyal, Jr., Esquire  
Law Office of Joseph S. Weimer  
975 Two Chatham Center  
Pittsburgh, PA 15219  
(412) 338-3184  
PA I.D. #65907  
Attorney for Defendants  
County of Erie, Erie County Office of  
Children and Youth a/k/a Erie County Child  
Welfare Service, Richard Schenker, Peter  
Callan, and Debra Liebel

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing DEFENDANTS', COUNTY OF ERIE, EIRE COUNTY OFFICE OF CHILDREN AND YOUTH a/k/a EIRE COUNTY CHILD WELFARE SERVICE, RICHARD SCHENKER, PETER CALLAN, DEBRA LIEBEL, OPPOSITION TO PLAINTIFF'S AMENDED MOTION TO EXTEND DISCOVERY has been served by First Class Mail, postage pre-paid, upon the following parties on this 3<sup>rd</sup> day of February, 2006.

Anthony Angelone, Esquire  
Vendetti & Vendetti  
3820 Liberty Street  
Erie, PA 16509  
(*Counsel for Plaintiff*)

Timothy D. McNair, Esquire  
Law Office of Timothy D. McNair  
821 State Street  
Erie, PA 16501  
(*Counsel for Plaintiff*)

Mark R. Lane, Esquire  
Dell, Moser, Lane & Loughney, LLC  
525 William Penn Place, Suite 3700  
Pittsburgh, PA 15219-1707  
(*Counsel for Defendant, John A. Onorato, Esquire*)

LAW OFFICE OF JOSEPH S. WEIMER

s/Edmond R. Joyal, Jr.  
Edmond R. Joyal, Jr., Esquire  
Attorney for Defendants  
County of Erie, Erie County Office of  
Children and Youth a/k/a Erie County Child  
Welfare Service, Richard Schenker, Peter  
Callan, and Debra Liebel